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November 21, 2022

Via CM/ECF
Special Master Thomas P. Scrivo, Esq.
O'Toole Scrivo, LLC
14 Village Park Road
Cedar Grove, New Jersey 07009
tscrivo@oslaw.com

Re: Occidental Chemical Corp. v. 21st Century Fox Am., Inc., et al.,

Civil Action No. 2:18-cv-11273-MCA-LDW

Dear Special Master Scrivo:

We are enclosing a Joint Stipulation and Proposed Order regarding Deposition-Related Motions executed by counsel for OxyChem and all liaison counsel. The parties respectfully request entry of the Joint Stipulation and Proposed Order.

Respectfully submitted,

Kathy D. Patrick

/s/ John J. McDermott

John J. McDermott

Enc.

cc: All counsel of record

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